

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
5 John Neukom (Bar No. 275887)
johnneukom@quinnemanuel.com
6 Jordan Jaffe (Bar No. 254886)
jordanjaffe@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
8 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

9
10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 CASE NO. 3:17-cv-00939-WHA

15 Plaintiff,

16 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR RESPONSE TO
WAYMO'S SUBMISSION TO SPECIAL
MASTER COOPER REGARDING THE
JACOBS DOCUMENTS**

17 vs.

18 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

19 Defendants.

20

21

22

23

24

25

26

27

28

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
 7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Response to Waymo’s Submission
 8 to Special Master Cooper Regarding the Jacobs Documents (the “Administrative Motion”). The
 9 Administrative Motion seeks an order sealing highlighted portions of Uber’s Response and of Exhibit
 10 J to the Declaration of Sylvia Rivera (“Rivera Exhibit J”), as well as the entirety of Exhibits A-E to
 11 the Declaration of Marcie Brimer (“Brimer Exhibits A-E”), Exhibits A-D to the Declaration of Samuel
 12 Cortina (“Cortina Exhibits A-D”), Exhibit A to the Declaration of Maxwell Pritt (“Pritt Exhibit A”),
 13 and Exhibits A-F, I, and L-P to the Declaration of Sylvia Rivera (“Rivera Exhibits A-F, I, and L-P”).

14 3. The portions of Pritt Exhibit A and Rivera Exhibits B-D and M-O identified below
 15 contain or refer to trade secret and confidential business information, which Waymo seeks to seal.

16 4. Pritt Exhibit A (portions highlighted in green in version filed herewith) and Rivera
 17 Exhibits B-D and M-N (portions highlighted in green in version filed herewith) contain, reference,
 18 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
 19 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including
 20 its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are
 21 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s
 22 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
 23 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
 24 information were made public, I understand that Waymo’s competitive standing would be
 25 significantly harmed.

26 5. Rivera Exhibit O (portions highlighted in green in version filed herewith) contains,
 27 references, and/or describes Waymo’s highly confidential and sensitive business information. The
 28 information Waymo seeks to seal regards the confidential analysis of Waymo’s business and

1 competition, including potential partnerships and actual and potential acquisitions. I understand that
2 this confidential business information is maintained by Waymo as secret. The public disclosure of
3 this information would give Waymo's competitors access to in-depth insight into—and analysis of—
4 Waymo's business strategy for its autonomous vehicle system. If such information were made public,
5 I understand that Waymo's competitive standing would be significantly harmed.

6. Waymo's request to seal is narrowly tailored to those portions of Pritt Exhibit A and
7 Rivera Exhibits B-D and M-O that merit sealing.

8
9 I declare under penalty of perjury under the laws of the State of California and the United
10 States of America that the foregoing is true and correct, and that this declaration was executed in San
11 Francisco, California, on December 12, 2017.

12 By /s/ Felipe Corredor
13 Felipe Corredor
14 Attorneys for WAYMO LLC

15
16 **ATTESTATION**

17 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
18 document has been obtained from Felipe Corredor.

19
20 By: /s/ Charles K. Verhoeven
21 Charles K. Verhoeven
22
23
24
25
26
27
28